

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CRIMINAL NO. 12-20030

Plaintiff,

HON. NANCY G. EDMUNDS

-vs-

D-1 JEFFREY BEASLEY,

Defendant.

**STIPULATION FOR CONTINUANCE OF TIME TO FILE
PRETRIAL MOTIONS AND FINDING OF EXCLUDABLE DELAY**

Through their respective counsel, the parties stipulate and agree to the adjournment of the time to file pretrial motions, for the following reasons:

The Indictment in this case was returned on January 18, 2012. It remained sealed until February 28, 2012. Defendant, Jeffrey Beasley, was arraigned on the Indictment on March 12, 2012.

There is a great deal of discovery material in this case. The government is in the process of gathering and organizing this material. Defense counsel will need a significant amount of time to review and analyze this material in order to determine what, if any, pretrial motions to file.

The period of delay caused by the continuance of the motion cut off date should be excluded from the calculation of the 70 day clock from indictment to trial under 18 U.S.C. § 3161(h)(7) on the basis that the ends of justice served by such a delay outweigh

the best interests of the public and the defendants in a speedy trial. *Zedner v. United States*, 547 U.S. 489, 506 (2006).

IT IS SO STIPULATED.

s/Robert P. Cares

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UNITED STATES OF AMERICA,

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Plaintiff,

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D-1 **JEFFREY BEASLEY**,

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**ORDER FOR CONTINUANCE OF TIME TO FILE
PRETRIAL MOTIONS AND FINDING OF EXCLUDABLE DELAY**

Upon this Court's consideration of the parties' stipulation for a continuance of the time to file pretrial motions and the Court being apprised of the circumstances,

IT IS ORDERED that the motion cut-off date be adjourned until August 14, 2012;

IT IS FURTHER ORDERED that the time period resulting from the continuance of the motion cut-off date shall be deemed excludable delay under the provisions of the Speedy Trial Act, 18 U.S.C. § 3161, because, considering the factors listed in section 3161(h)(7)(B), defense counsel needs additional time to obtain, review, and analyze an extensive amount of discovery material in order to determine what pretrial motions to file, and therefore the ends of justice served by this delay outweigh the best interests of the defendants and the public in a speedy trial.

IT IS SO ORDERED.

s/Nancy G. Edmunds

Nancy G. Edmunds

United States District Judge

Dated: April 11, 2012

I hereby certify that a copy of the foregoing document was served upon counsel of record on April 11, 2012, by electronic and/or ordinary mail.

s/Carol A. Hemeyer

Case Manager